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9 UNITED STATES BANKRUPTCY COURT  
 10 EASTERN DISTRICT OF CALIFORNIA  
 11 SACRAMENTO DIVISION  
 12

13 In re:  
 14 CITY OF STOCKTON, CALIFORNIA,  
 15 Debtor.

Case No. 2012-32118  
 D.C. No. OHS-19  
 Chapter 9

16 **MOTION FOR ORDER SHORTENING**  
 17 **NOTICE ON MOTION FOR ORDER**  
 18 **APPROVING STIPULATION FOR**  
 19 **ORDER PURSUANT TO 11 U.S.C.**  
 20 **§ 365(d)(4) FURTHER EXTENDING**  
 21 **TIME WITHIN WHICH TO ASSUME**  
 22 **OR REJECT UNEXPIRED LEASES OF**  
 23 **NONRESIDENTIAL REAL**  
 24 **PROPERTY**

21 Date: June 19, 2014  
 22 Time: 9:30 a.m.  
 23 Dept: Courtroom 35  
 24 Judge: Hon. Christopher M. Klein

1 The City of Stockton, California (the “City”), respectfully moves (by this “Motion”) for  
2 entry of an order shortening the notice period for the hearing on the City’s Motion For Order  
3 Approving Stipulation For Order Pursuant To 11 U.S.C. § 365(d)(4) Further Extending Time  
4 Within Which To Assume Or Reject Unexpired Leases Of Nonresidential Real Property (the  
5 “Third Stipulated Extension Motion”), which the City is filing concurrently. Pursuant to Local  
6 Rule 9014-1(f)(3), the Court may, for good cause shown, order that the amount of notice for a  
7 hearing be shortened to fewer than 14 days. The City respectfully represents that good cause  
8 exists to shorten notice of the hearing on the Third Stipulated Extension Motion from 14 days to 6  
9 days.

10 The City has previously filed two stipulated extension motions (Dkt. Nos. 1143 and 1245)  
11 seeking extensions of the time within which to assume or reject the five unexpired leases of  
12 nonresidential real property (each a “Lease”) that are the subject of the Third Stipulated  
13 Extension Motion.<sup>1</sup> The parties in interest<sup>2</sup> to the Leases stipulated to both motions. The Court  
14 approved both motions (by orders docketed at Dkt. Nos. 1154 and 1251) prior to their noticed  
15 hearing dates. The parties in interest to the Leases have stipulated to the Third Stipulated  
16 Extension Motion. The City is aware of no opposition to the Third Stipulated Extension Motion.  
17 Further, the Third Stipulated Extension Motion is time-sensitive because the current deadline  
18 within which the City must assume or reject the Leases is June 30, 2014.

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25 <sup>1</sup> Although described as lease transactions, it could be argued that certain of these transactions should be classified as  
26 secured loan transactions. Such transactions are included in the Third Stipulated Extension Motion only in an  
abundance of caution in the event that such transactions are classified as true leases. As set forth therein, the  
Stipulating Parties reserve all rights with respect to these issues.

27 <sup>2</sup> National Public Finance Guaranty Corporation, Assured Guaranty Corporation and Assured Guaranty Municipal  
28 Corporation, Ambac Assurance Corporation, and Wells Fargo Bank National Association as Indenture Trustee with  
respect to the Lease transactions identified in the Third Stipulated Extension Motion (together with the City, the  
“Stipulating Parties”).

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For the foregoing reasons, the City believes that cause exists to grant the City an order shortening the notice period on the Third Stipulated Extension Motion such that the Third Stipulated Extension Motion will be heard on June 19, 2014, at 9:30 a.m.

Dated: June 12, 2014

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By:           /s/ Marc A. Levinson            
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